

POLLUTION PREVENTION SUBGROUP TELECONFERENCE
FLASH MINUTES
March 18, 1998

ATTENDEES

Beth Berglund*	Bill Bilkovich	Sam Clowney*	Linda Coerr
Jan Connery	Rick Copland	John deRuyter*	Lachhman Dev*
Jennifer Gallbraith	Alex Johnson*	Miriam Lev-On*	Bill O'Sullivan*
Janet Peargin*	Fred Porter*	David Schanbacher*	Jocelyn Siegel
John Shoaff*	Chuck Solt*	Jane Williams*	Heather Wright

*Pollution Prevention Subgroup members

DISCUSSIONS AND DECISIONS

- C Fred Porter presented a status update on the operator training working group. The group has received several comments on the draft document that was presented at the Los Angeles meeting, but has not met since that time.
- C Alex Johnson presented a status update on the output working group. The group has drafted information on steam and fluid management opportunities and are also working to develop the following items: a paper on an alternative compliance options, a document outlining incentives for pollution prevention for ICCR sources, a model that focuses on specific energy loads, information on output based standards, and a paper on energy and HAP reductions for combustion sources. In addition, this group has coordinated efforts with the input working group to ensure that efforts are not duplicated.
- C John Shoaff presented a status update on the input working group. The group is in the process of developing options for regulatory techniques. They are exploring *de minimis* and other alternative limits, as a means of providing an incentive for the use of pollution prevention techniques, in addition to waste segregation and cross cutting issues.
- Teleconference participants discussed the information that was drafted and distributed on input fuel limits, options for ICCR MACT limits, alternative compliance methods, and examples.
- C Teleconference participants discussed the need to demonstrate quantitative reductions in emissions resulting from pollution prevention techniques and good combustion practices (GCPs). It was agreed that any documentation showing that these techniques reduce HAP emissions is very limited. It was suggested that Subgroup members look for guidance

information to help determine what assumptions can be made about pollution prevention, GCPs, and emissions reductions, as there is insufficient time for testing.

- C Subgroup members agreed that when their final recommendations are presented to the Coordinating Committee (CC), they must also set in motion a process by which the source work groups and industry will seriously consider the information. A suggestion was made that the Subgroup examine utilization of wording in the general provisions to prompt people to explore alternative regulatory techniques.

ACTION ITEMS

- C The operator training working group/combustion device team agreed to meet from 8 to 10 a.m. on March 31 prior to the full Subgroup meeting to discuss their research and findings.
- C Subgroup members are to forward additional comments on the information presented by the input working group to John Shoaff as soon as possible.
- C The working groups will develop draft language of their final recommendations for the CC before the March 31 Subgroup meeting. It was suggested that the groups finalize their information and recommendations to the best extent possible by March 27 and distribute it to the entire Subgroup for review and feedback prior to the meeting.
- C Beth Berglund and John deRuyter will begin to develop language on alternative regulatory techniques that the Subgroup could recommend to the CC be included in the general provisions.
- C Information to be presented at the April CC meeting must be forwarded to Fred Porter by COB April 17 to be posted to the TTN the following week.

NEXT MEETING

- C The next meeting is scheduled for Tuesday and Wednesday, March 31 - April 1, 1998 at the Clarion International Hotel/Quality Inn at O'Hare in Chicago, IL. The meeting will begin at 10 a.m. on March 31; no end time as been established. A start time has not been scheduled for April 1, but it has been determined that the meeting will end at 5 p.m.
 - The Subgroup has agreed to first review the information presented by the operator training, input, and output working groups and then develop final recommendations that will be presented to the CC in April.